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March 13, 2022

via ECF

Hon. Colleen McMahon
United States District Court Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2550
New York, NY 10007

Re: *Pearlstein v. Blackberry Limited, et al.*, No. 1:13-cv-7060 (S.D.N.Y.)

Dear Judge McMahon:

Plaintiffs write to inform the Court that the parties met and conferred yesterday, March 12, 2022, in an attempt to further narrow the issues in advance of tomorrow's Final Pre-trial Conference and in light of, among other things, the Court's March 11, 2022 Order on the Parties' Motions *in Limine*. See ECF No. 790. Plaintiffs are pleased to report that they have significantly narrowed their deposition designations and list of exhibits, as well as their objections and counter-designations to Defendants' deposition designations and exhibits.

Attached hereto for reference please find: (1) Plaintiffs' Second Amended Deposition Designations, "Exhibit A"; (2) Plaintiffs' Second Amended Trial Exhibit List, "Exhibit B"; and (3) the Second Amended Joint Trial Exhibit List, "Exhibit C." Plaintiffs will of course bring courtesy copies of the same to tomorrow's Conference.

Plaintiffs look forward to the Conference and stand ready to promptly respond should the Court require any further information.

Respectfully submitted,

/s/ Kim E. Miller
Kim E. Miller